PROJECT 023-001

STORAGE FACILITY

PERMIT APPLICATION

SAFETY-KLEEN SYSTEMS, INC. SERVICE CENTER

ALBUQUERQUE, NEW MEXICO

NMD 000804294

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Prepared for:

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CERTIFICATION STATEMENT

Albuquerque, New Mexico Service Center

NMD 000804294

The undersigned, being an authorized representative of Safety-Kleen Systems, Inc. the permit applicant, certifies under penalty of law that this document and all attachments were prepared under my direction or supervision in accordance with a system designed to assure that qualified personnel properly gather and evaluate the information submitted. Based on my inquiry of the person or persons who manage the system, or those persons directly responsible for gathering the information, the information submitted is, to the best of my knowledge and belief, true, accurate, and complete. I am aware that there are significant penalties for submitting false information, including the possibility of fine and imprisonment for knowing violations.

Mike Crawford
Branch Manager

Date

ATTESTATION

The undersigned, attesting witness to the Certification Statement and this document dated July 27, 2001, of which this affidavit is a part, states that I am personally responsible for the preparation of the document, that I personally gathered or reviewed the information contained herein, and further that the information, to the best of my knowledge and belief is true, accurate, and complete.

Dan Czecholinski
Environmental, Compliance Manager

Date

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1.0 FACILITY DESCRIPTION

ABSTRACT

CORPORATE HEADQUARTERS:	Safety-Kleen Systems, Inc. 1301 Gervais Street Columbia, South Carolina 29201 (803) 933-4200
RESPONSIBLE OFFICIALS:	Mike Crawford Branch Manager
FACILITY ADDRESS:	Safety-Kleen Systems, Inc. 2720 Girard NE Albuquerque, New Mexico 87107
TELEPHONE NUMBER:	(505) 884-2277
U.S. EPA I.D. NUMBER:	NMD 000804294
GEOGRAPHIC LOCATION:	35° 06' 44" N 106° 36' 46" W
OWNER:	Safety-Kleen Systems, Inc. 1301 Gervais Street Columbia, South Carolina 29201 (803) 933-4200
DATE OPERATIONS BEGAN:	March 1, 1977

DESCRIPTION OF ACTIVITIES

This facility is an accumulation point for used solvents generated by Safety-Kleen customers, the majority of whom are small quantity generators. All wastes are ultimately shipped to a Safety-Kleen recycling facility or a contract reclaimer and then returned to the Company's customers as product.

PROPERTY DESCRIPTION: 1.05 acres with the following structures:

a. one building with offices and a warehouse with two areas for container storage;

b. two underground double-walled storage tanks (one for product and one for used solvent)

c. one loading dock with a solvent return and fill station; and

d. one enclosed flammable storage building to be used for container storage.

FACILITY TYPE: Storage in an underground tank (S02) and in containers (S01)

STORAGE UNIT	CAPACITY (GAL.)	SECONDARY CONTAINMENT (GAL.)	MATERIAL TO BE STORED
Tank	12,000	See note 1	Used Solvent (D001) and the codes listed in note 2 below)
West Container Storage Warehouse	4,310	431	Used Immersion Cleaner codes listed in note 2 below) Dry Cleaning Waste (F002 and the codes listed in note 2 below) Used Solvent (and the codes listed in note 2 below) Photo/Imaging Wastes - D011[3]
East Container Storage Warehouse	2,680	268	Used Immersion Cleaner (F002, F004, and the codes listed in note 2 below) Dry Cleaning Waste (F002 and the codes listed in note 2 below) Used Solvent (and the codes listed in note 2 below)
Flammable Storage Building	9,650	965	Paint Waste (D001, F003, F005, and the codes listed in note 2 below), used solvent and dumpster sediment

Notes: 1. Secondary containment consists of a double-walled tank and leak detection system.
2. D004, D005, D006, D007, D008, D009, D010, D011, D018, D019, D021, D022, D023, D024, D025, D026, D027, D028, D029, D030, D032, D033, D034, D035, D036, D037, D038, D039, D040, D041, D042, and D043
3. Photo/Imaging wastes may not be considered a hazardous or solid waste if the hazardous constituent (silver) is reclaimed.

1.0 FACILITY DESCRIPTION

1.1 DESCRIPTION OF BUSINESS ACTIVITY

Safety-Kleen Systems, Inc. is an international service-oriented company whose customers are primarily engaged in automotive repair, industrial maintenance and dry cleaning. The company has been operating since 1968 offering solvent collection and reclamation services for its 400,000 customers, more than 99% of whom generate less than 1000 kilograms (2200 pounds) per month.

Currently, Safety-Kleen offers several services, which involve the accumulation and storage of used solvent at the Albuquerque service center. Periodically, these wastes are shipped from the service center to a Safety-Kleen recycle center or to an independent reclaimer. The wastes are processed and generally are then returned to customers as usable product. Two-thirds of the solvent used by Safety-Kleen customers has been reclaimed with the remainder being purchased from a vendor. A unique feature of the solvent recycling system is that Safety-Kleen retains ownership of the parts cleaning machines and the solvent. This "closed loop" system allows the Company to maintain control of the solvent except when it is in use at the customer's place of business. A description of typical services Safety-Kleen provides its customers is provided below.

1.1.1 Parts Cleaner Service

The original service offered by the Company in 1968 was the parts cleaner service and it remains the primary business activity. This service involves the leasing of a small parts degreasing unit which consists of a sink affixed to a container meeting DOT specifications and contains solvent. On a regularly scheduled basis, a Safety-Kleen service representative cleans and inspects the parts washer machine and replaces the drum of used solvent with one of clean product. Each service representative performs about fifteen of these services per day, collecting the drums of used solvent on a route van.

At the end of each day, the solvent is transferred from the drums to a storage tank at the service center and drums of product are prepared for the next day's services. Used solvents are poured into the dumpster/drum washer in the return and fill station. It is then pumped into the storage tank for used solvent. Periodically a tanker truck is dispatched from one of the recycle centers to deliver a load of clean solvent and collect the used solvent at the service center.

Safety-Kleen also provides an aqueous-based parts washer solvent to its customers. The aqueous-based solvents are also delivered and picked up from customers' locations in containers. Once returned to the service center, containers of used aqueous-based solvents may be poured into the drum washers/dumpsters in the return/fill station and transferred to the waste storage tank, or stored in the original container and placed in the drum storage area. Aqueous-based solvents may also be bulked in larger containers and placed in the drum storage area. Aqueous-based solvents are also processed at a Safety-Kleen recycle center or contract reclaimer, where used aqueous-based solvents are recycled into useable product.

Another type of parts washer, the immersion cleaner, is available for the removal of varnish and gum from such things as carburetors and transmissions. This machine consists of an immersible basket with an agitator affixed to a container meeting DOT specifications. The used solvent remains in the drum after delivery to the service center where it is stored in a contained area of the warehouse. Periodically, a box trailer truck is dispatched from a recycle center to deliver containers of fresh solvent and collect the containers of used immersion cleaner solvent for reclamation.

Safety-Kleen has also established a parts cleaner service for users who own their machines. This service, known as the Customer Owned Machine Service, provides a solvent reclamation service to these customers regardless of machine model. The used solvent is pumped from the customer owned machine to a standard Safety-Kleen container meeting DOT specifications by a Safety-Kleen sales representative. The used solvent is stored in the same manner as the waste solvent collected from the leased parts cleaner machines. The service representative then refills the customer-owned machine with Safety-Kleen solvent via a pump. The waste solvent handling and management procedures from customer-owned machines are consistent with those for Safety-Kleen solvents.

1.1.2 Dry Cleaner Service

In 1984, Safety-Kleen began offering a service for the collection of filter cartridges and still bottoms contaminated with dry cleaning solvents (usually perchloroethylene). These wastes are drummed on the customer's premises and are periodically collected by a service representative. The drummed waste is accumulated in a contained area of the warehouse for shipment to a Safety-Kleen recycle center. About 35% of this waste is returned to dry cleaners as usable product.

1.1.3 Paint Waste Service

In 1986, a paint waste reclamation program was initiated to service automobile body repair businesses. Wastes containing thinners and paints are collected in containers meeting DOT specifications on the customer's premises. The service representative collects these containers and stores them in an enclosed masonry block, flammable storage building which is separate from the office/warehouses. These wastes are periodically shipped to a reclaimer and the regenerated solvent is distributed to Safety-Kleen customers for use as product.

1.1.4 Imaging/Photochemical Service

Imaging waste consists typically of three waste streams. Photo fixer solution is used to etch photo film during processing. This material is characteristic for silver (D011). Safety Kleen is able to recover the hazardous constituent from the photo fixer solution. Used photo developer is an aqueous solution used to neutralize the etching effects of the photo fixer. This material exhibits no hazardous characteristics but may not be discharged into public wastewater treatment system in some communities. Silver collection canisters are sent to a recycle center for silver reclamation. These canisters do not meet the definition of a solid waste per 40 CFR 260.30(c) and are managed as a non-regulated material.

The Imaging/Photochemical wastes are placed in containers at the customer's place of business. Several of these wastes are not considered hazardous or solid wastes because the hazardous constituent may be reclaimed. However, the service representative collects these containers and stores them in the container storage area of the warehouse. The imaging/photochemical wastes are then re-manifested and periodically sent to a Safety-Kleen recycle center, contract reclaimer or other permitted treatment facility.

1.2 DESCRIPTION OF THE FACILITY

The Albuquerque service center has been operating as a storage facility since March 1, 1977. The facility consists of the following structures.

a. 2,500 square foot warehouse with offices, bathrooms, a sales representative room, and two containerized areas (east and west) for drum storage;

b. two 12,000 gallon underground storage tanks for clean and used solvent;

c. a solvent return and fill station with a loading dock; and

d. one enclosed building used for flammable storage.

Descriptions of the surrounding area of the service center follow. Applicable maps and site plans are presented at the end of this section.

1.2.1 Regional Description

The Albuquerque, New Mexico Service Center is located in Barnalillo County about one mile northwest of Carlisle Blvd., and S.R. 40. This area is zoned for manufacturing and, to the best of Safety-Kleen's knowledge, no easements or title, deed or usage restrictions exist which may be in conflict with operations at this site.

Albuquerque is bordered by the 11,000 acre Cibola National Forest to the east and the Canocito Navajo Indian Reservation to the west. The total population of Albuquerque and surrounding areas in Bernalillo, Sandoval, and Valencia counties is about 350,000. The climate in this area is an arid, continental climate. Rainfall varies, but in the vicinity of the service center, average annual precipitation is 7 to 10 inches. Average snowfall is about 10 inches. The average temperature in winter is approximately 38 degrees F and 74 degrees F in Summer. Winds blow from the north in winter and from the south in summer. The average annual wind speed is 9 miles per hour.

Albuquerque is located in the Rio Grande Valley, and is bordered on both sides by mesas rising about 5,000 feet. The elevation at the service center is approximately 5,100 feet. The service center is not within a 100-year flood plain.

The soil in the vicinity of the service center is the Wink Series. These deep, well drained soils are formed in unconsolidated alluvium but have been modified by colian erosion. The

slopes are generally 0 to 1 percent in the area of the service center. The surface layer is a brown, fine sandy loam.

The Albuquerque Service Center receives its water from the City of Albuquerque which also maintains a sanitary sewer line on Girard Boulevard. Drainage in this area is by way of a series of diversion channels. The North Diversion Channel is directly east of the service center.

No known oil or gas wells exist within one quarter mile of the site and it is not located in or near a wetland or critical habitat. No schools, parks or hospitals exist within one quarter mile of the facility.

The non-building areas of the facility are paved with asphalt, gravel or concrete as noted on the site plan (Figure 1). The majority of the vehicular traffic and loading/unloading operations occur at and near the return and fill station and this area is paved with asphalt and concrete. The entrance to the facility is on Girard Boulevard, which is the major access road to the facility. The access road was designed in accordance with engineering criteria appropriate for sustaining the traffic volume and loading for the manufacturing activities in this area. The route vans that daily travel the routes between the service center and its customers use the two-lane approach driveway.

This permit application has been organized using a format similar to the previously approved permit application to maintain consistency. The remaining sections of this permit application (Waste Analysis Plan, Security Measures, Inspection Plan, etc.) are included in attachments A through H. Information relevant to each of the specific attachments is presented at the end of each attachment, and separated by cover pages.

ATTACHMENT A

WASTE ANALYSIS PLAN

WASTE ANALYSIS PLAN

ABSTRACT

Waste Description	EPA Waste Code No.	Facility Capacity[1] (gallons)	Annual Amount[2]
Used Solvents	D001[3]	12,000	143
Tank/Dumpster Bottom Sediment	D001[3]	N/A	3
Used Immersion Cleaner	See Below[3]	6,990	3
Dry Cleaning Waste	F002[3]	Included with Used Immersion Cleaner	6
Used Solvent (aqueous)	See Below[3]	Included with Used Immersion Cleaner	3
Paint Waste	D001, F003, F005[3]	9,650	14
Photo Chemical Wastes	D011	Included with Used Immersion Cleaner	3

[1] The facility capacity is in gallons.

[2] The annual amount is in thousands of gallons.

[3] and may include D004, D005, D007, D008, D009, D010, D011, D018. D019, D021, D022, D023, D024, D025, D026, D027, D028, D029, D030, D032, D033, D034, D035, D036, D037, D038, D039, D040, D041, D042, D043.

WASTE ANALYSIS PLAN

A.1 DESCRIPTION OF WASTES

Several types of waste result from the servicing of Safety-Kleen customers and the maintenance of the service center. It should be noted that the solvents managed at this facility are incompatible with strong oxidizers and reactive metals, none of which are present in the containers, container storage area, or the concrete sealant. The solvents are also compatible with one another. Analytical data for the wastes and specifications for the products are in Attachment A-1 and qualitative descriptions follow.

A.1.1 Wastes Resulting From the Parts of Washer Service

Used solvents from parts washers is accumulated in a 12,000 gallon underground, double-walled storage tank via the return and fill station. Containers of used material are poured into a dumpster at the return and fill station which in turn empties into the tank. This waste handling method results in several types of solvent waste:

a. Used solvent - The used solvent is removed from the tank by a tanker truck on a scheduled basis. About 5,000 gallons are removed every month. This waste is ignitable (D001) and may exhibit the toxicity characteristic of D004, D005, D006, D007, D008, D009, D010, D011, D018, D019, D021, D022, D023, D024, D025, D026, D027, D028, D029, D030, D032, D033, D034, D035, D036, D037, D038, D039, D040 D041, D042, and D043.

b Bottom sediment in the tank - Approximately once every two years, it is necessary to remove sediment and other heavy material from the bottom of the tank. A Safety-Kleen vacuum truck is generally used for this purpose. The sediment is ignitable (D001) and may exhibit the toxicity characteristic of D004, D005, D006, D007, D008, D009, D010, D011, D018, D019, D021, D022, D023, D024, D025, D026, D027, D028, D029, D030, D032, D033, D034, D035, D036, D037, D038, D039, D040 D041, D042, and D043.

c. Dumpster Sediment - Sediment may also accumulate in the drum washers in the return/fill station. The sediment is manually removed and placed in containers. The dumpster sediment is representative of the waste codes described in items a and b above.

d. Used Aqueous Parts Cleaning Solvent - may be bulked at the service center into containers that meet DOT specifications or may be co-mingled with the other solvent into the used solvent tank. It may be toxic using the toxicity characteristic of D004, D005, D006, D007, D008, D009, D010, D011, D018, D019, D021, D022, D023, D024, D025, D026, D027, D028, D029, D030, D032, D033, D034, D035, D036, D037, D038, D039, D040 D041, D042, and D043.

e. Immersion Cleaner - is a different type of solvent that is not placed in the underground storage tank. Containers of immersion cleaner typically remain in

the drum in which it was originally used until it is received at the recycle center. Drums are placed in the drum storage area of the warehouse and are stacked no more than two-high in the drum storage area of the warehouse.

The immersion cleaner is a non-halogenated hydrocarbon mixture and may exhibit the toxic characteristics of D004, D005, D006, D007, D008, D009, D010, D011, D018, D019, D021, D022, D023, D024, D025, D026, D027, D028, D029, D030, D032, D033, D034, D035, D036, D037, D038, D039, D040 D041, D042, and D043.

A.1.2 Wastes Resulting From the Dry Cleaner Service

Dry cleaning wastes consist of used filter cartridges, powder residue from diatomaceous or other powder filter systems and still bottoms. These wastes are packaged on the customer's premises in containers meeting DOT specifications. The containers are then palletized, stacked two-high and placed in the container storage area of the warehouse. Approximately 95% of the dry cleaning solvent used is perchloroethylene (F002 and D004, D005, D006, D007, D008, D009, D010, D011, D018, D019, D021, D022, D023, D024, D025, D026, D027, D028, D029, D030, D032, D033, D034, D035, D036, D037, D038, D039, D040 D041, D042, and D043) and the remaining 5% is trichloro-trifluoroethane (F002) and toxic using the characteristic leaching procedure (D004, D005, D006, D007, D008, D009, D010, D011, D018, D019, D021, D022, D023, D024, D025, D026, D027, D028, D029, D030, D032, D033, D034, D035, D036, D037, D038, D039, D040, D041, D042, and D043).

A.1.3 Wastes Resulting From the Paint Service

Paint wastes consist of various lacquer thinners (D001, F003, and F005) and may be toxic as per the characteristic leaching procedure (D004, D005, D006, D007, D008, D009, D010, D011, D018, D019, D021, D022, D023, D024, D025, D026, D027, D028, D029, D030, D032, D033, D034, D035, D036, D037, D038, D039, D040, D041, D042, and D043). The wastes are collected in containers which meet DOT requirements at the customer's place of business and containers are then palletized and stored in an enclosed concrete masonry building (the H-3 Flammable Storage Building).

A.1.4 Photographic/Imaging Wastes

Some photographic imaging wastes managed by the facility are not solid wastes per 40 CFR 261.2(c) because their hazardous constituent is reclaimed. Others are managed under the provisions of Subpart F of 40 CFR 266 – Recyclable Materials Utilized for Precious Metals Recovery. Imaging waste consists typically of three waste streams. Photo fixer solution is an aqueous solution used to etch photo film during processing. This material is characteristic for silver (D011). Safety-Kleen is able to recover the silver from the solution. Used Photo developer is an aqueous solution that exhibits no hazardous waste characteristics but may not be allowed to discharge into public wastewater treatment systems in some communities. Silver collection canisters are sent to a recycle center for reclamation. These canisters do not meet the definition of a hazardous waste as per 40 CFR 260.30(c) and are managed as a non-regulated material.

A.2 QUALITY CONTROL PROCEDURES

The used solvents are the primary feed stocks for the generation of Safety-Kleen solvent products. As a result, quality control of the used solvents is necessary to ensure that reclamation occurs in the safest and most efficient manner possible. The service center collects used solvents from approximately 1,100 customers, most of who are small quantity generators, and an estimated 14,000 drums containing recoverable solvents are returned to the service center each year for shipment to a reclaimer. With such large numbers of waste generators and waste shipments, performing detailed analyses at the service center is economically and logistically infeasible.

Furthermore, as discussed earlier in the Facility Description, all the materials collected at the service center are managed at all times in a closed loop system and are usually collected from a company with a single process. The composition and quality of these materials are known and Safety-Kleen's operating experiences have shown that the collected materials rarely deviate from company specifications. As an additional safeguard, Safety-Kleen personnel are instructed to inspect all materials before returning them to the service centers as described in Section A.2.1. This mode of operation has been proven to safeguard the recycling process and maintain a quality product.

However, in accordance with HWMR 206.B.3, Safety-Kleen will perform physical and chemical analysis of a waste stream when it is notified or has reason to believe that the process or operation generating the waste has changed, or when the result of inspection indicates that the waste collected does not match that designated. It is Safety-Kleen's practice that suspected non-conforming material must not be accepted until a full analysis has been conducted. If a container with questionable contents is returned to the service center, a sample will be taken and analysis will be performed at the recycling center, Safety-Kleen Tech Center (Elk Grove Village, Illinois) or other qualified lab according to the procedures outlined in Section A.3 of this attachment. The Branch Manager will be notified of any contamination that may have occurred.

Safety-Kleen trains personnel to verify the physical characteristics of the wastes at several points in the management of the solvent. These procedures are described briefly below.

Safety-Kleen controls the use and management of its solvents by:

1. Limiting the solvents stored to those compatible with one another and their containers;

2. Limiting the uses of each type of solvent for (example, dry cleaning waste is only collected from dry cleaner shops);

3. Determining the customer's type of business (i.e., the SIC code is recorded) and the purpose for which the customer will use the machine;

4. Training customers to use the machines properly;

5. Training employees to inspect the physical characteristics of used solvent and determine whether it is acceptable;

6. When waste is collected from a customer, indicate on the service document whether the used solvent meets Safety-Kleen's acceptance criteria;

7. Marking each container with the customer's name, address, and EPA I.D. number (if available). This information remains on containerized waste until it is accepted at the reclamation facility;

8. Keeping a record of each incoming and outgoing shipment in the operating log; and

Safety-Kleen's customers sign a service document containing the following information:

a. the name, address and EPA I.D. number of the facility to which the waste is being shipped;
b. the customer's name, address and EPA I.D. number (if available); and

c. the description and amount of Safety-Kleen solvent waste generated.

In addition, each incoming and outgoing shipment is recorded in the facility's operating log.

If a waste is rejected at the time of service, the customer will be given a choice as to whether he will dispose of the waste himself or require Safety-Kleen's assistance. If he requests Safety-Kleen's assistance, a sample will be drawn using a Coliwasa tube or similar sampling device to ensure representative samples. The sample will be analyzed for flash point and volatile organic compounds. If this analysis does not adequately define the constituents, additional analyses will be performed as necessary (e.g., semi-volatile organic compounds, PCBs, etc.).

The laboratory sends waste analyses results to the service center. If through the additional analysis the waste is determined to be acceptable at the branch, it will be relabeled, manifested and then managed with the other wastes. If it is determined through the additional analysis to not be acceptable, the waste will either be: (a) managed at the Service Center on a 10 day transfer basis and manifested to a properly permitted reclamation or disposal facility, or (b) manifested and shipped directly to a properly permitted reclamation or disposal facility. The analytical results from the additional characterization analysis will be used to appropriately manage the waste. The Branch Manager has the right to refuse any further service to a business which has returned waste that does not meet acceptable criteria.

A.2.1 Qualitative Waste Analysis

a. General Inspection Procedures:
Safety-Kleen visually inspects each drum of waste when it is collected at the customer's location. Safety-Kleen examines the waste for volume, appearance, consistency and odor and is intimately familiar with the characteristics of the waste it receives. Based on the known waste characteristics, Safety-Kleen has established the specific acceptance criteria set forth below, to be used by Safety-Kleen personnel in their visual inspections. These inspection procedures allow Safety-Kleen to ensure that the waste being picked up meets appropriate acceptance criteria.

If a particular drum of waste does not meet the acceptance criteria, the Safety-Kleen service representative will either (1) sample the waste for testing at a Safety-Kleen laboratory to determine whether the waste has been contaminated; or (2) reject the waste. In the event the waste is not sampled, Safety-Kleen will notify the generator's State Agency that is authorized to implement the RCRA hazardous waste management program (or EPA if the RCRA program has not been delegated to the State).

If the waste is sampled for further analysis, the service representative will collect a sample, then seal the drum and label it as hazardous waste. The drum is left with the customer pending the results of the laboratory tests. The laboratory testing initially involves analyzing the suspect waste for flash-point and the presence of volatile organic compounds. Pending those results, additional constituents may also be analyzed. The costs of any sampling and testing performed as a result of the waste failing to meet the acceptance criteria, will be borne by the customer.

If the laboratory analysis reveals that the sampled waste is not contaminated, Safety-Kleen will accept the waste from the customer. If the laboratory confirms that the waste is contaminated, the generator will be responsible for securing an alternate means of disposal or they may contract with Safety-Kleen to handle the waste on a ten-day transfer basis.

b. Waste Specific Criteria:
The following is a description of the specific acceptance criteria for each waste stream.

1. Used solvent:

The acceptance criteria for determining by visual inspection whether used solvent has been contaminated are volume, odor and color, the most significant of which is volume. If the volume of waste in a given drum exceeds the specified level, the Safety-Kleen service representative will conduct an inquiry of the customer's operation and handling procedures. Contingent on the customer's responses, the solvent may be accepted, a sample of the waste may be collected for laboratory testing as described above, or the waste may be rejected.

In addition to the volume criterion, the odor of the used solvent may typically indicate whether the waste has been contaminated. Used solvent has a distinctive odor. The service representatives are expressly instructed not to deliberately sniff the waste. However, if the solvent has been contaminated the service representative may notice a difference in the odor when he services the machine.

The used solvent is also visually inspected for its color. Unused solvent typically has a clear or greenish tint. As the solvent is used, it turns brown in color. The more it is used, the darker brown it becomes, until it is almost black. In the case of a print shop, the solvent may be clear, green, brown, black, or many colors. Therefore, if the used solvent does

not appear to be the expected color, the service representative will sample the waste for possible contamination as described above, or will reject the waste.

2. Immersion Cleaner:

The criteria for the inspection of used immersion cleaner are volume and color. If the volume of waste exceeds the specified level a sample will be tested for contamination following the procedures described above or the waste will be rejected.

Unused immersion cleaner is amber in color. As the solvent is used, it turns brown in color. The more it is used, the darker brown it becomes, until it is almost black. If the used immersion cleaner does not appear to be the expected color, the service representative will either sample the waste for possible contamination as described above, or reject the drum of waste.

3. Dry Cleaner Wastes:

Dry cleaner wastes normally consist of used filter cartridges, powder residue, and still bottoms.

a. Used Filter Cartridges:
Used filter cartridges are placed in containers meeting DOT specifications. It is obvious to the service representative whether the items in the drums are filter cartridges. The drums may also contain approximately one inch of liquid which should either be clear or have a light brownish tint. If the amount of the liquid is greater than approximately one inch or if the liquid is a color other than light brown, the service representative will sample the waste for contamination in accordance with the procedures described above, or will reject the waste.

b. Powder Residue:
The criteria for the acceptance of powder residue are consistency and color, the former being the more significant criterion of the two. A drum of powder residue should not contain any liquid. As the name implies, it will be dry or "powdery". If there is any liquid in the drum, the waste will be sampled for contamination in accordance with the procedures described above, or the waste will be rejected.

The powder residue is also inspected for color and should appear to be grayish-black. If the residue is not grayish-black in color, the service representative will sample the waste for contamination in accordance with the procedures described above, or will reject the waste.

c. Still Bottoms:

The criteria for the acceptance of dry cleaning still bottoms are consistency and color. The waste should have a highly viscous, tar-like consistency. If the consistency of the waste is too thin or if there is more than one inch of free liquid in the drum, the waste will be sampled for contamination in accordance with the procedures described above, or will be rejected.

In addition to consistency, the still bottom waste is inspected for color. The waste should appear dark brown or black in color. If the waste is a different color, a service representative will sample the waste for contamination in accordance with the procedures described above, or will reject the waste.

4. Paint Wastes:

Safety-Kleen handles both lacquer thinner waste generated from the paint gun cleaning process and paint waste.

a. Lacquer Thinner Waste:

The significant criterion for determining whether lacquer thinner waste will be accepted is volume. The solvent is provided to customers in pails which meet DOT requirements. The paint gun cleaning machine operates as a closed system where by there should never be a combined volume of more than the expected amount of solvent in the two collection pails. The solvent is pumped from a tube in a left hand pail (facing the machine) through the machine into the right hand pail. The left hand pail starts with clean solvent which will be pumped out as the machine is used to clean the spray guns. If a service representative discovers more than the expected amount of solvent in the two pails, or there is an overfill from the right hand pail, the waste will be sampled for contamination in accordance with the procedures described above, or the waste will be rejected.

b. Paint Waste:

b.1 Liquid

The significant criterion for the inspection of paint waste is consistency. The waste should contain no more than 30 percent solids. The service representative will insert a Colliwasa or similar sampling device into the drum. The sampling device should glide easily down to the bottom of the drum. The service representative will handle this waste as a Class 3 flammable waste. If there is resistance to the insertion of the glass tube, it is assumed that the level of solids is in excess of 30 percent and the service representative will reject the waste.

The contents of the glass tube are also visually examined for consistency and water content. The material should be a "free flowing" liquid, but should not contain a significant

amount of water. If there is more than approximately 10 inches of water in the 3 foot tube (the water and paint will separate in the tube and thus can be measured) the waste will be rejected.

b.2 Solid:
For waste containing more than 30 percent solids the service representative will handle the waste as a Class 4 flammable waste.

5. Photographic/Imaging Waste

Photographic/Imaging waste is collected from facilities where one process is managed and the possibility of cross contamination is minimal. The sales representative inspects the contents of the containers of photographic/imaging waste when the sales representative services the customer. The pH and silver content of the waste is checked at the time of service, and the waste is also inspected visually.

A.3 WASTE ANALYSES AT THE RECYCLE CENTER

Analyses performed at the Safety-Kleen recycle centers are undertaken to safeguard the recycling process and to assure a product quality. The following section summarizes the waste analyses practiced at the recycle center for the hazardous materials returned form the Albuquerque branch. For each waste type stored at the branch, at least the following analyses must be performed annually (annual re-characterization analysis). If a particular waste stream is not managed at the service center during the previous year, no re-characterization analysis is performed. Copies of the results for the annual analyses must be maintained at the branch office for the life of the permit. A copy of the most recent re-characterization analysis is contained in Attachment A-1.

A.3.1 Solvents

- Flash point (must be greater than 90°F).

If the flashpoint is unacceptable, the Albuquerque Branch Manager will be notified immediately and the load will receive appropriate special handling. If the results are acceptable, the following tests will be performed:

- Volatile Organic Analysis, using EPA Methods 8015, 8021, 8260, or approved equivalents.
- Physical appearance, including bottom sediment and water content
- Specific gravity

- pH
- Distillation performance

If any of these tests yield unacceptable results or indicate solvent contamination outside the normal range, the Branch Manager will be notified immediately.

In addition to the tests listed above, which will be performed on a representative sample from every load received at the recycle center from the Albuquerque service center, a full Toxicology Characteristic Leaching Procedure (TCLP) analysis for all 40 constituents, (except for pesticides and herbicides) will be performed at least once each calendar year.

A.3.2 Solvent Tank Bottom Sludge and Free Water

- Flash point (Must be greater than 90°F).
- Analysis for content of lead, cadmium, and chromium.
- pH

As described above for solvent, a full TCLP analysis (except for the pesticides and herbicides) will be performed on a representative sample at least once each calendar year.

A.3.3 Immersion Cleaner Solvent

Containers of waste immersion cleaner are typically characterized at the recycle center using the following criteria:

- Flash point
- Physical appearance
- Specific gravity
- Percent water
- Volatile Organic Analysis (using EPA methods 8015, 8021, 8260 or approved equivalents)

If any of these tests yield unacceptable results or indicate solvent contamination outside the normal range, the Branch Manager will be notified immediately. As described above, a full TCLP test (except for pesticides and herbicides) will be performed on a representative sample of immersion cleaner at least once each calendar year.

A.3.4 Dry Cleaning Solvent/Still Bottoms

- Physical appearance
- Volatile Organic Analysis for Perchlorothylene (using EPA methods 8015, 8021, 8260 or approved equivalents)
- Specific gravity

If any of these tests yield unacceptable results or indicate contamination outside the normal range, the Branch Manager will be notified immediately.

As described above, a full TCLP test (except for pesticides and herbicides) will be performed on a representative sample of dry cleaning waste at least once each calendar year.

A.3.5 Paint Waste

Paint wastes are generally characterized at the recycle center using the following criteria:

- Metals
- Flash points
- Physical appearance
- Specific gravity
- Percent water
- Volatile organic analysis (using EPA methods 8015, 8021, 8260, or approved equivalents)

As described above, a full TCLP test (except for pesticides and herbicides) will be performed on a representative sample of paint waste at least once each calendar year.

A.4 WASTE ANALYSIS PLAN UPDATE

This waste analysis plan will be modified when a new waste product is collected or when sampling and material management methods change. Revision of the plan is typically the responsibility of the Safety-Kleen corporate or regional compliance offices.

A.5 LAND BAN NOTIFICATION/CERTIFICATION FORMS

In accordance with 40 CFR 268.7(a)(2), Safety-Kleen provides a one time written notice for wastes banned for land disposal with the initial shipment. No further notification is necessary unless the waste changes. Safety-Kleen will provide the written notice for wastes banned from landfills as follows:

1. Printing the Notice language on manifests - such as for core-business customers to branch shipments; or

2. Special forms for each regularly handled waste types (e.g., parts washer solvents, immersion cleaner, dry cleaning wastes, etc); or

3. A general form that must be completed for unique or non-standard waste streams. These wastes will only be handled on a transfer basis in accordance with 40 CFR 263.12.

The notice is required paperwork for all Safety-Kleen waste types. Shipments lacking the proper Notice will not be accepted by any Safety-Kleen facility. When a shipment with the proper Notice is received, the notice is kept in the files of the receiving facility with the manifest or with the pre-print if a manifest is not used.

A.6 OPERATING LOG RECORD

Safety-Kleen maintains an operating log record on site which includes the following information as it becomes available:

1. A description and the quantity of each hazardous waste received, and the method and date of its storage as required by Pt. V. Sec. 264, Appendix I;

2. The location of hazardous waste within the facility and quantity;

3. Records and results of waste analyses performed;

4. Summary reports and details of all incidents that require implementing the contingency plan;

5. Records and results of inspections;

6. Monitoring, testing or analytical data and corrective action where required;

7. For off-site facilities, Notices to generators as specified in 264.12(b);

8. Closure and post-closure cost estimates;

9. A certification by the permittee no less often than annually, that the permittee has a program in place to reduce the volume and toxicity of hazardous waste; and

10. The land ban notices and requirements. These records are kept on file at the facility.

A.7 WASTE DETERMINATION FOR SUBPART BB AND CC COMPLIANCE

For purposes of waste determination, this facility utilizes knowledge of the wastes described in Section A.1, A.2 and A.3 above. For those hazardous wastes which are managed on a transfer basis, the Subpart CC regulation does not apply. However, the owner/operator may use knowledge of the waste based on information included in manifests, shipping papers, or waste certification notices to confirm waste determination for the generator or the ultimate receiving facility.

Based upon this knowledge, it has been determined that all wastes managed in tanks or containers at this facility may display an average volatile organic concentration of greater than 500 ppmw at the point of waste origination. Documentation of this knowledge is provided in Attachment A-1 (waste characterization analytical results), as required in 40 CFR 264.1063(d) and 264.1083. Therefore, hazardous wastes managed in tanks or containers at this facility shall be managed in accordance with the applicable Subpart CC standards.

ATTACHMENT A-1

ANNUAL RE-CHARACTERIZATION DATA

ATTACHMENT B

SECURITY MEASURES

SECURITY MEASURES

The facility is secured with a six-foot high chain link fence topped by three strands of barbed wire inside a coil of barbed wire. Access gates are locked when the facility is unoccupied. Warning signs in English and Spanish are placed at the entrances stating "Danger - Unauthorized Personnel Keep Out", and are visible from twenty-five feet. An electronic entrance gate is located at the front of the facility which can automatically be opened and closed to allow trucks to enter and exit. In addition, outdoor lights are on sensoring devices that activate at low light conditions.

The office/warehouse building is secured with locks on all doors and warning signs are posted at all entrances to work and waste storage areas. These warning signs are posted in both English and Spanish.

The tanks are inaccessible in that material can not be added to or removed from them without activating the pumps, the controls for which are outside the return and fill station. The pumps are not activated unless solvent product or waste is being added to or removed from the tanks by Safety-Kleen personnel. The container storage area is also locked during non-operating hours. As a result the tanks and container storage areas are accessible only by Safety-Kleen personnel. In addition, warning signs are posted on the return and fill station. These warning signs are posted in both English and Spanish.

ATTACHMENT C

INSPECTION PLAN

INSPECTION PLAN

C.1 INSPECTION PROCEDURES

The Service Center Manager (i.e., Branch Manager) or designate is responsible for carrying out and documenting the facility inspection (example inspection forms are in Attachment C-1). The inspections are performed each operating day. He must note any repairs that are needed and assure that they are completed. If the repairs cannot be implemented by onsite personnel, the Technical Services Department at Safety-Kleen's corporate headquarters must be notified for assistance. Completion of repairs must also be documented on the inspection form.

The Environmental Compliance Manager or other regional or corporate personnel responsible for compliance issues reviews the Facility Inspection Record with the Branch Manager periodically to insure that they are properly completed and that any necessary repairs have been conducted.

The facility inspection includes the following:

a. Tank Inspections --At a minimum, the tanks holding the solvent product and used solvent are inspected each operating day. The inspections include checks of the high level alarm, the volume held in the tank and checks of the leak detection system for any releases. Sudden deviations in the solvent volumes will be investigated and their causes determined. If necessary, repairs must be initiated immediately. When the tank used to store used solvent is 85% full, a pickup must be scheduled with Safety-Kleen's corporate dispatch department. The solvent must not exceed 95% of the tank volume at any time. The tanks are also inspected to comply with Subpart CC requirements.

   A liquid sensing leak detector is between the two walls (secondary containment) of the tanks and the recorder chart must be checked weekly. Any leaks detected which may indicate damage to the secondary containment must be noted and repairs initiated.

b. Solvent dispensing equipment--The solvent dispensing hose, connections and valves must be inspected for damage (such as cracks or leaks) and proper functioning each operating day. Any solvent in the hoses must be drained after use. The pumps, pipes and fittings must also be checked before use for damage and proper functioning. Any damage to the solvent dispensing equipment must be noted and repaired. The dispensing equipment is also inspected to comply with Subpart BB requirements.

c. Drum storage areas--The drum storage area is inspected each operating day and the number and condition of the drums noted. Container inspections are also conducted to comply with Subpart CC requirements. The total volume of the used solvent held in the drum storage area must not exceed ten times the amount that can be collected in the secondary containment system. The contents of any leaking or suspect drums must be placed in a drum of adequate

integrity. The drums must be properly labeled and marked in accordance with U.S. DOT, EPA and New Mexico hazardous waste regulations. The secondary containment systems must be inspected for deterioration on failure. If cracks or leaks are detected, they must be repaired immediately.

d. Route vehicles--Each route vehicle must be inspected prior to use to insure proper operation. In addition, necessary safety equipment must be on board and may include sorbents, fire extinguisher, eye wash, first aid kit, reflector kits, rubber gloves, plastic aprons, and safety glasses.

e. Dumpster/Drum washers--The two wet dumpsters/drum washers (in the return and fill station) must be inspected weekly for leaks and sediment buildup. Any leaks must be noted and repaired immediately and excess sediment must be removed from the dumpster.

f. Safety equipment--The fire extinguishers must be checked weekly to insure that the units are charged and accessible. In addition, the operation of the eyewash must be confirmed weekly and the first aid kit and sorbents must be inspected weekly for adequate content and accessibility. Emergency equipment information is in Attachment F.

g. Security--The operation of each outside light, gate, and lock must be checked each operating day. In addition, the fence must be inspected for deterioration on a weekly basis.

C.2 SUBPART CC COMPLIANCE

Safety-Kleen has developed a Subpart CC Compliance Plan, which details procedures to achieve compliance with Subpart CC requirements. The plan includes provisions for an annual visual tank inspection of the waste solvent storage tank (to the extent possible) and vent system, as well as container inspections upon arrival at the facility and proper container management. A copy of the Subpart CC Compliance Plan is included in Attachment C-2.

C.3 SUBPART BB COMPLIANCE

Safety-Kleen complies with Subpart BB requirements by inspecting the process piping and equipment. Each valve, joint, flange, pressure relief device, pump, etc. is inspected to insure the equipment is not leaking and is functioning properly. Open-ended pipes are capped when not in use. An equipment inventory for inspections (Attachment C-3) is used to document compliance with Subpart BB inspections, and as required by 40 CFR 270.25.

ATTACHMENT C-1

EXAMPLE INSPECTION FORMS

ATTACHMENT C-2

SAFETY-KLEEN SUBPART CC COMPLIANCE PLAN

SUBPART CC COMPLIANCE PLAN

Safety-Kleen Systems, Inc.
2720 Girard NE
Albuquerque, New Mexico 87107
NMD000804294

The Safety-Kleen Albuquerque, New Mexico facility shall control air pollutant emissions from waste management units at this facility pursuant to the requirements of RCRA Subpart CC, through implementation of this compliance plan.

The following plan describes this facility's waste determination procedures, tank and container design/management practices, organic emission controls, inspection and monitoring, and recordkeeping and reporting, pursuant to requirements/standards promulgated under RCRA Subpart CC.

Waste Determination Procedures

For purposes of waste determination, this facility utilizes knowledge developed in the Waste Characteristics portion of the Operation Plan/Permit. For those hazardous waste which are managed on a transfer basis, and which are not described in the Operation Plan/Permit, the Subpart CC regulation does not apply. However, the owner/operator may use knowledge of the waste based on information included in manifests, shipping papers, or waste certification notices to confirm waste determination for the generator or the ultimate receiving facility.

Based upon this knowledge, it has been determined that all wastes managed in tanks or containers at this facility may display an average volatile organic concentration of greater than 500 ppmw at the point of waste origination. Therefore, all hazardous wastes managed in tanks or containers at this facility shall be managed in accordance with the applicable Subpart CC standards.

Point of Waste Origination

The point of waste origination for all wastes generated offsite and transported to the site in closed containers, which are subsequently managed in tanks or containers at this facility, is effectively the site boundary at the entrance gate.

For those hazardous wastes generated onsite, the point of waste origination is the point of waste generation, as previously defined in RCRA.

Tanks

Tanks which manage organic wastes at this facility are described in detail in the Operation Plan/Permit. Certain features of these units, as they relate to the Subpart CC standards, are described below.

Waste mineral spirits USTs and ASTs are fixed roof, non-pressurized, quiescent tanks. All waste tanks at the facility are Level 1 tanks under Subpart CC. The tank design capacity is less than 20,000 gallons, and the waste in these tanks exhibits a vapor pressure of less than 76.6 kPa (11.1 psi). The actual vapor pressure of the waste managed in tanks is $\approx$0.2 psia. The

maximum organic vapor pressure is determined using knowledge of the waste pursuant to 265.1084(c)(4). Documentation for the basis of this determination is found in the Waste Characteristics portion of the Operation Plan/Permit.

These tanks are designed so that all cover openings can be closed with no visible gaps, holes, cracks, or other open spaces into the interior of the tank. The cover and all cover openings operate with no detectable emissions when in a closed position. Cover openings are maintained in a closed position at all times except when waste is being added to or removed from the tank, or when necessary sampling or repair/maintenance is performed on the tanks.

These tanks are vented to the atmosphere through a safety device (conservation vent) which has been designed to operate with no detectable organic emissions when the device is in the closed position. In addition, these tanks are designed with a long-bolted manway pressure relief device, which remains in the closed position when not in use to relieve pressure.

The drum washing units at this facility are fixed roof, Level 1 tanks. These tanks are kept closed except when adding or removing wastes, sampling, or performing routine maintenance that requires the lid to be open.]

Containers

Containers which manage organic wastes at this facility are described in detail in the Operation Plan/Permit. Certain features of these units, as they relate to the Subpart CC regulations, are described below.

Containers managing hazardous wastes at this facility generally fall into three categories. (1) Those hazardous waste containers that are less than 26 gallons in capacity are wholly exempt from consideration under Subpart CC. S-K manages wastes with vapor pressures greater than 0.3 kPa at 20 ^{o} C (e.g. lacquer thinner) in containers less than 26 gallons. In addition, containers of wastes that are transferred through the facility are still “in the course of transportation,” and therefore are exempt from Subpart CC. (2) Containers with capacities between 26 and 122 gallons are all Level 1 containers, and generally meet the Level 1 standards as covered containers designed and operated with no gaps, holes, cracks, or other open spaces into the container. In addition, all Safety-Kleen containers used to manage waste meet applicable U.S. DOT regulations on packaging hazardous materials for transportation. S-K does not typically manage wastes with vapor pressures greater than 0.3 kPa at 20 ^{o} C in containers with capacities between 26 and 122 gallons. Non-typical wastes that may be received in containers between 26 and 122 gallons and have vapor pressures that are greater than 0.3 kPa at 20 ^{o} C, are managed “in the course of transportation” and are exempt from Subpart CC, as described in 1) above. (3) Containers with capacities greater than 122 gallons that manage hazardous wastes at this facility are not in light material service (i.e. containers greater than 122 gallons are not used to manage wastes with vapor pressures greater than 0.3 kPa at 20 ^{o} C). Containers greater than 122 gallons are however, Level 1 covered containers designed and operated with no gaps, holes, cracks, or other open spaces into the container. In addition, all Safety-Kleen containers used to manage wastes comply with applicable U.S. DOT regulations on packaging hazardous materials for transportation.

Inspection and Monitoring

Hazardous wastes accepted from off-site generators are already containerized when the facility accepts the waste. Such containers are visually inspected either at the time they are unloaded

for storage or staged for transfer at the facility, or during the daily facility inspection. The inspection occurs within 24 hours of the waste's arrival at the facility. This written plan and schedule to perform the inspections is incorporated in the facility inspection plan by this reference.

No defects were noted on the used solvent underground storage tank, which could result in air pollutant emissions. Visual tanks inspections shall be conducted on an annual basis.

Recordkeeping

Documentation of tank and tank cover design: See Operation Plan/Permit.

Documentation of waste determination: See Waste Characteristics portion of Operation Plan/Permit.

Records of all visual inspection: See daily facility inspection records, and enclosed record of initial tank inspection.

Listing of all tanks, by unique identifying number, which are difficult or unsafe to inspect: See enclosed.

Results of the determination of the maximum vapor pressure of waste in tanks and record of the tank dimensions and design capacity: See Operation Plan/Permit.

Safety-Kleen Solvents
Vapor Pressure Summary
(Isoteniscope Method)

Product Name	Product Number	68^0 F (20^0 C)				100^0 F (38^0 C)			
		mm-Hg	psia	K Pa	atm	mm-Hg	psia	K Pa	atm
S-K 105	6614 (CA) 6617 (Non-CA)	2	0.039	0.267	.003	6	0.116	0.800	0.008
S-K 140	6616	<1	<0.019	<0.133	<0.001	1.5	0.029	0.200	0.002
S-K 150 (Premium)	6605	.6	0.012	0.080	0.001	1.7	0.033	0.227	0.002
Immersion Cleaner	699	<0.41	<0.0079	<0.055	_	_	_	_	_
Actrel PC-95	6608	.02	0.0004	0.003	0.001	_	_	_	_
Heavy Duty Lacquer Thinner	6782	75-94.7	1.45-1.83	10-12.6	0.10-0.134	_	_	_	_
Low V.P. Lacquer Thinner	6664	24-35	0.46-0.68	3.20-4.67	0.03-0.05	_	_	_	_

ATTACHMENT C-3

EQUIPMENT INVENTORY FOR INSPECTIONS

ATTACHMENT D

PERSONNEL TRAINING

PERSONNEL TRAINING

D.1 OUTLINE OF TRAINING PROGRAM

Each employee is trained to operate and maintain the facility safely, and to understand hazards unique to the job assignment. This section contains information on service center personnel and trainers, job descriptions, training outlines and training record forms. All employees at the facility have had training that satisfies the requirements of 40 CFR 264.16. The regional environmental professional directly assists with the training of new Branch Managers. The Branch Manager, in turn, trains his employees. An employee may not work in an unsupervised position until he or she has received proper training as outlined in Attachment D-2.

D.2 ORGANIZATION STRUCTURE AND JOB DESCRIPTIONS

Environmental compliance and training of facility employees is the responsibility of the Branch Manager. The Safety-Kleen corporate office provides a training program to be executed annually. The training program is directed by personnel trained in hazardous waste management procedures and includes instruction on hazardous waste management for facility personnel that is in accordance with 40 CFR 264.16(a)(2). In accordance with 40 CFR 264.16(d)(1), job descriptions for branch personnel are in Appendix D-2. A list of employees, their job titles and job functions will be maintained at the facility.

D.2.1 Branch Manager

The Branch Manager (which may include the resource recovery manager, branch sales manager, branch automotive manager, etc. or designate) is ultimately responsible for the operations at the service center. The sales representatives, secretary and Material Handler report to the Branch Manager and he, in turn, must provide the training and materials necessary for the branch employees to execute their duties. With respect to environmental compliance, the Branch Manager must:

a. keep the service center clean and orderly;

b. execute or designate an employee to execute the daily inspection, keep a written log and remediate any problems;

c. know the potential hazards of the material and waste handled on site;

d. identify potential spill and fire sources and be able to execute the contingency plan;

e. inform all employees of their environmental responsibilities;

f. act as emergency coordinator and notify the proper authorities during an emergency, remediate the situation to the best of his abilities, and submit necessary reports to the corporate office; and

g. maintain all environmental records (such as manifests, training records and spill reports) on file.

D.2.2 Corporate Compliance Department

Safety-Kleen's Corporate Compliance Department has personnel on staff who provide guidance to divisional and regional personnel for training, permitting, and other compliance issues for service centers in a given geographic area of the country.

D.3 DESCRIPTION OF THE TRAINING PROGRAM

Employee training is accomplished using classroom, videotape, and on-the-job methods. This training is sufficient to allow the Branch Manager to in turn train his facility employees. The regional/corporate offices prepare a training program for employees, and documents that the program has been executed.

Facility employees are trained prior to starting or as soon as he or she begins working (depending on his or her position) and annually thereafter. Safety-Kleen ensures that the Branch Manager has received adequate training in order to train branch personnel. An example training outline is provided in Attachment D-2, and demonstrates that facility personnel are trained in hazardous waste management procedures.

D.3.1 Training of new Branch Managers

New managers are trained for several weeks before they begin their new positions. This training includes onsite, on the job, and offsite classroom training. While being trained at a designated "training facility", a new manager reviews all environmental records and learns the record keeping requirements. These records include: Waste Analysis Profiles, manifests, personnel records, training records, facility inspection records, and spill reports.

The training culminates with additional training at his/her new facility, under the direction of an environmental professional. This training may include a review of the facility permit, Part A and Part B permit application including the Waste Analysis Plan, Inspection Plan Preparedness and Prevention Plan, Contingency Plan, Training Plan and Closure Plan. Additional time is used reviewing past environmental compliance at the Branch Manager's facility and regulations unique to his state are discussed as well.

D.3.2 Training of New Branch Secretaries

Branch secretaries are trained in the proper record keeping procedures as soon as they begin working for Safety-Kleen. While they are not usually responsible for preparing the documentation, they must check it for accuracy and completeness and then process or file it as required. Additional training is overseen by the Branch Manager and is done within six months of starting. It includes the items listed in the Example Training Plan Outline (Attachment D-1), and may include emergency response, shipping documents (including manifests), drum labels and other safety and environmental compliance issues.

D.3.3 Training of Sales Managers

A Branch Sales Manager is a middle management position created to supervise the sales force within a specific line of services. The Sales Manager position will be particular to a specific line of Safety-Kleen business and will be filled according to the needs of the facility. The primary goal of this position is to direct and assist the Branch Manager in attaining sales goals in a specific line of business which Safety-Kleen offers. Though most training for this position is within the area of sales, the Sales Manager also receives the training in the Example Training Outline in Attachment D-1. A Sales Manager may also be trained as the designate for performing facility inspection. A review of the Contingency Plan with the Branch Manager (or designate) is required. A job description for this position can be found in Attachment D-2.

D.3.4 Training of New Sales Representatives

New sales representatives are trained onsite where they are introduced to manifests, facility inspection records, and training records. A sales representative may also be trained as the designate for performing the facility inspection. Additional training may be in the form of videotape presentations and a review of the Contingency Plan. The Contingency Plan must be reviewed with the Branch Manager (or designate) before the sales representative formally begins their new position and annually thereafter. All items listed in the Example Training Plan Outline (Attachment D-1) must be explained within six months of starting.

D.3.5 Training of New Material Handlers

A Material Handler is trained to maintain the service center and assist the other branch employees in their tasks. He/She may be a designate for the facility inspection and must be trained by the Branch Manager (or designate) as such. Within two weeks, the Branch Manager (or designate) must review the Contingency Plan with the Material Handler, and within six months the Material Handler must review the items listed in the Example Training Plan Outline (Attachment D-1).

D.3.6 Annual Training

On an annual basis, employees are trained using a program prepared and updated annually by the Safety-Kleen regional and/or corporate compliance offices and health and safety department. The annual training includes updates on environmental regulations, an in-depth review of the Contingency Plan and a review of RCRA inspection criteria.

Service center employees must annually review the items listed in the Example Training Plan Outline. This review may be in the form of slide/tape, videotapes and/or classroom presentation, and a review and discussion of the storage facility permit application. In addition, periodic memoranda on changes in environmental regulations are issued by the regional/corporate offices and must be read and discussed by branch personnel.

D.4 TRAINING RECORDS

Employees may complete a written examination at the conclusion of a training program. The employee training is documented and the records are maintained onsite. Employees may not work in unsupervised positions until the contingency plan has been reviewed and they understand emergency response procedures.

ATTACHMENT D-2

EXAMPLE EMPLOYEE JOB DESCRIPTIONS

ATTACHMENT D-1

EXAMPLE TRAINING PLAN OUTLINE

ATTACHMENT E

FACILITY DESIGN, WASTE HANDLING, PREPAREDNESS AND PREVENTION PROCEDURES

PREPAREDNESS AND PREVENTION PLAN

ABSTRACT

SECURITY MEASURES--The site is secured as follows:

a. There is a chain link fence with three strands of barbed wire inside a coil of barbed wire around the facility.

b. Warning signs are posted at all entrances.

c. Locks are on all entrances to the warehouses and the Flammable Storage Building.

d. Remote controls for all tank operations are inside the warehouse.

e. There is outdoor lighting on all sensoring devices and automatically comes on at low light hours of the day.

INSPECTION PROCEDURES: See Attachment C for sample copy of the Facility Inspection Record and Procedure.

REQUIRED EQUIPMENT--The emergency equipment requirement is met with the following:

a. Internal communications will be by voice.

b. Telephones are available in the warehouse.

c. Fire extinguishers are available next to exits in the warehouse and the Flammable Storage Building.

d. Water is supplied by the City of Albuquerque.

PREPAREDNESS AND PREVENTION PLAN

E.1 FACILITY DESIGN

The Albuquerque service center was designed to minimize the possibility of spills or fires and to minimize the effects of any accidents which may occur. Specifications for the storage facilities, secondary containment and other equipment are at the end of Attachment E and descriptions follow.

E.1.1 Tank Storage

The 12,000 gallon underground storage tank is 8' in diameter and 32.5' long. It is constructed of ¼" thick carbon steel and is double-walled with a leak detection system installed in the interstitial space. The exterior of the outside tank is coated with a plastic-fiberglass mixture so that no metal is exposed and the tank is isolated from electrical currents. The tank is constructed in accordance with Underwriter's Laboratories Standard 58 and is located more than 5' from the building foundation, in accordance with NFPA requirements. A liquid sensing leak detector is between the two walls, and must be checked each operating day.

A manually controlled waste-feed cut-off valve located adjacent to the wet dumpsters at the return and fill station can prevent the tank from being overfilled. The tank is equipped with an aural (siren) and visual (strobe light) high-level alarm system which will alert employees when the tank is approximately 600 gallons from being full and the pump automatically shuts off. The pump on the tanker truck can be turned off immediately if the alarm sounds when filling the product solvent tank. A manual button can be used to test the alarm to insure the system is operable. The fill pipes are secondarily contained to prevent spills during loading and unloading operations.

Cathodic protection has been installed for the carbon steel/FRP-coated composite tank. A copy of the report by the independent corrosion expert who designed the cathodic protection system for the tank and supervised its installation is included in Attachment E-2. A description of the high level alarm system, leak detection system, and installation documentation is provided in the report.

The return and fill station is a concrete block structure with a metal roof and the secondary containment is monolithically poured concrete. Elevated grating is situated above the containment area, which allows workers to easily remove or return containers to the route trucks, and transfer used solvents to the waste storage tank via the drum washer units. The two dumpster/drum washers are tight-piped to the tank, piping is below ground and the joints are welded to minimize the potential for leaks.

E.1.2 Drum Storage

The slab, curbing and collection trenches for the drum storage areas in the warehouses and flammable storage building are made of steel-reinforced concrete and the concrete has been poured so that no cracks or gaps exist between them. A concrete curb, approximately

four inches high and six inches wide, encompasses the storage area except where there is a trench. Steel grates cover the trench to facilitate the movement of drums across it. The concrete floor and curbing is coated with a material so as to be impermeable to contain leaks and spills. The materials placed in the drum storage areas are compatible with the containers in which they are stored.

The immersion cleaner, dry cleaning wastes, aqueous solvent, and paint wastes are stored in containers meeting DOT specifications. Immersion cleaner and dry cleaner waste are never opened at the branch facility except for annual re-characterization sampling. The drums are placed on pallets to facilitate shipping and storage.

Ignitable wastes in containers are stored at least fifty (50) feet from the property line in the masonry flammable building. The H-3 Flammable Storage Building wall construction is of concrete masonry. Secondary containment is provided by a coated, reinforced concrete floor that slopes toward a blind sump and collection trenches. It is painted with light colors (white and beige) to reflect sunlight and provided with an exhaust fan to prevent extremely high temperatures and an accumulation of fumes. An overhead door secures the building during non-operating hours.

E.2 WASTE MANAGEMENT PRACTICES

The Albuquerque service center was designed to facilitate the handling and storage of the wastes resulting from the services offered by Safety-Kleen. The underground storage tanks, drum storage areas and return and fill station all have secondary containment and the service center has the equipment necessary for employees to safely manage wastes onsite.

Used solvent from parts washers is accumulated in a 12,000 gallon underground double-walled storage tank via the return and fill station. Used material in containers meeting DOT specifications is poured into the dumpsters in the return and fill station and the material in the dumpster is pumped into the used solvent storage tank. The return and fill station has secondary containment in the form of a 20.0' x 14.8' (1,548 gallons) concrete slab with curbing and a sump. The total volume of waste and product will not exceed 10 times the secondary containment volume.

The sediment which accumulates in the bottom of the dumpster/drum washer is removed manually (as necessary), drummed and temporarily stored in the return and fill station according to the satellite accumulation requirements of 40 CFR 262.34(b). Sediment is placed in the drum to no more than 2 inches from the top of the drum.

The underground tanks have been designed in accordance with UL Standard 58 and are constructed of carbon steel and are installed in accordance with NFPA standards. Double walls equipped with a leak detection alarm provide secondary containment. Two tanks with capacities of 12,000 gallons each are present; one is for clean and one is for used solvent. Each tank is equipped with an audible and visual high level alarm.

The drum storage areas in the warehouse are used to store containers of waste, which may include (1) used immersion cleaner, (2) dry cleaning wastes, and (3) used aqueous solvent and (4) used photochemical wastes. Additional materials, such as non-hazardous wastes,

transfer wastes, or product may be stored as needed. The wastes are not mixed while on site and different wastes are segregated according to their contents. While the wastes are not incompatible with one another, it is necessary to segregate them for inventory and quality control purposes. All containers are stored on pallets.

The drum storage areas have secondary containment in the form of a six inch wide by four inch high steel reinforced concrete curbs with an approximately 1.75' x 3' x 11' x 7.5' (431 gallons) in the West warehouse and two collection trenches with approximately 2' x 3' x 3' x 7.5' (132 gallons) and 2' x1.5' x 6' x 7.5' (136 gallons) for a combined collection trench capacity of 268 gallons in the East warehouse. No more than 4,310 gallons of waste will be stored in the West warehouse and no more than 2,680 gallons of waste will be stored in the East warehouse at any time.

Secondary containment in the Flammable Storage Building is provided by coated floors that slope to three collection trenches. The three collection trenches have dimensions of approximately 1.8' x 8.9' x 2.3' (276 gallons), 1.9' x 9.8' x 2.1' (295 gallons) and 1.9' x 11.9' x 2.3' (390 gallons) for a combined collection capacity of 965 gallons. The Flammable Storage Building is used for the storage of: 1) dumpster sediment; 2) paint waste, 3) used solvent; and (4) other flammable wastes or products, as necessary.

All containers used for storage of hazardous waste will meet DOT specifications. Example specifications for containers is included in Attachment E-3.

Adequate aisle spacing will be maintained in the warehouse container storage areas and Flammable Storage Building. Drums in the storage areas will be placed on pallets and moved with a forklift or pallet jack. Drums will be stored no more than two high on a pallet and no more than two pallets high.

E.3 RECORDKEEPING REQUIREMENTS

In accordance with 40 CFR 264.73, Safety-Kleen maintains a manifest system, an operating record, biennial reports and all other records required under these sections.

E.3.1 Manifest System

Safety-Kleen must implement the manifesting system required under 40 CFR 264.71. If the facility receives hazardous waste accompanied by a manifest, the Branch Manager or designate shall do all of the following:

a. Sign and date each copy of the manifest to certify that the hazardous waste covered by the manifest was received.

b. Note any significant discrepancies in the manifest on each copy of the manifest.

c. Within 30 days after the delivery, send a copy of the manifest to the generator.

d. Retain, at the facility, a copy of each manifest for not less than 3 years from the date of delivery. (Safety-Kleen is generally the TSDF as well as the transporter, so only one copy is kept on file).

The requirements described above do not apply to hazardous waste produced by generators of more than100 kilograms but less than 1,000 kilograms in a calendar month if both of the following requirements are met:

a. The waste is reclaimed under a contractual agreement pursuant to which the type and frequency of shipments are specified in the agreement and the vehicle used to transport the waste to the recycling facility and to deliver the regenerated material back to the generator is owned and operated by the reclaimer of the waste.

b. The generator maintains a copy of the reclamation agreement in his or her files for a period of not less than 3 years after termination or expiration of the agreement.

The facility will not receive bulk shipments of hazardous waste from a rail or water transporter.

When a shipment of hazardous waste is initiated form this facility, the Branch Manager or his designate must:

a. Prepare a manifest before transporting the waste offsite.

b. Designate on the manifest one facility which is licensed to handle the waste described on the manifest. The Branch Manager may also designate on the manifest one alternate facility which is licensed to handle the waste if an emergency prevents delivery of the waste to the primary designated facility.

c. Use a transporter who is properly licensed under the act or a generator-owned vehicle licensed under the act to transport the waste.

d. If the transporter is unable to deliver the hazardous waste to the designated facility or the alternate facility, the generator shall either designate another facility or instruct the transporter to return the waste.

Except as described in the next paragraph, the Branch Manager shall use a manifest form approved by the director which contains all of the following information.

a. A manifest document number.

b. The generator’s name, mailing address, telephone number, and EPA identification number.

c. The name and EPA identification number of each transporter.

d. The name, address, and EPA identification number of the designated facility and an alternate facility, if any.

e. The description of the waste required by DOT regulations in 49 CFR 172.101, 172.202, and 172.203.

f. The total quantity of each hazardous waste by units of weight or volume, and the type and number of containers loaded into or onto the transport vehicle.

g. The hazardous waste number describing the waste.

h. The following certification: "I hereby declare that the contents of this consignment are fully and accurately described above by proper shipping name and are classified, packed marked, and labeled, and are in all respects in proper condition for transport by highway according to applicable international and national government regulations and applicable state regulations."

i. Other certification statements required by the director based on requirements of the Solid Waste Disposal Act.

If the Branch Manager manifests a shipment of hazardous waste out of state, and if the state to which the shipment is manifested requires the use of another manifest, then the generator shall use that manifest.

The Branch Manager shall do all of the following when initiating a shipment:

a. Sign the manifest certification by hand.

b. Obtain the handwritten signature of the initial transporter and the date of acceptance on the manifest.

c. Retain one copy for his files.

d. Give the remaining copies to the transporter.

When Safety-Kleen receives or ships hazardous waste, the Branch Manager or designate must review the manifest and check the information on the manifest for correctness. It should be noted that the Safety-Kleen computer-prints most of the required information on the majority of its manifests. The employee checking the manifest must review the names, addresses, EPA and New Mexico I.D. and transporter numbers, the manifest document number and the telephone numbers listed. In addition, the hazardous material (HM) box should be checked, the waste description, DOT classification, DOT I.D. number and EPA Waste Code must be verified. The number of drums and pounds, as well as the symbols for these units must be correct. The generator, transporter(s) and TSDF operator must all print and sign their names and enter the date the waste was shipped or received, as appropriate.

Upon discovering a significant manifest discrepancy, the Branch Manager shall attempt to reconcile the discrepancy with the waste generator or transporter through telephone conversations or otherwise. If the discrepancy is not resolved within 15 days after receiving the waste, the Branch Manager shall immediately submit, to the director and regional administrator, a letter describing the discrepancy and attempts to reconcile it and a copy of the manifest or shipping paper at issue. Significant manifest discrepancies are differences between the quantity or type of hazardous wastes designated on the manifest or shipping paper and the quantity or type of hazardous waste a facility actually receives, as follows:

a. For bulk waste, significant discrepancies are variations of more than 10% in weight.

b. For batch waste, a significant discrepancy is any variation in piece count, such as a discrepancy of one drum in a truckload.

c. Significant discrepancies in type are obvious differences which can be discovered by inspection or waste analysis, such as waste solvent substituted for waste acid or toxic constituents not reported on the manifest or shipping paper.

E.3.2 Operating Record

The operating record is maintained at the facility, and includes:

a. a record of hazardous waste shipments rejected by the facility including the following:

1 the name of the generator and transporter;
2 the manifest number;
3 the date the shipment was rejected; and
4 the reason for rejection.

b. personal training records for all current personnel; and

c. the contents of the waste storage tank, the quantity of each waste received, and the date each period of accumulation begins (i.e., the date each waste solvent pickup occurs) must also be included in the operating record.

E.3.3 Biennial Report

A biennial report must be submitted by March 1 of each even numbered year. The biennial report shall be submitted on form 8700-13B. The report shall cover facility activities during the previous calendar year and shall include all of the following information:

a. The EPA identification number, name, and address of the facility.

b. The calendar year covered by the report.

c. For offsite facilities, the EPA identification number of each hazardous waste generator from which the facility received a hazardous waste during the year, and for imported shipment, the name and address of the foreign generator.

d. A description and the quantity of each hazardous waste the facility received during the year. For offsite facilities, this information shall be listed by EPA identification number of each generator.

e. The method of treatment, storage, or disposal for each hazardous waste.

f. The most recent closure cost estimate under 40 CFR 264.142.

g. The certification signed by the owner or operator of the facility or the owner or operator's authorized representative.

E.4 PLANT OPERATIONS – POTENTIAL SPILL AND FIRE SOURCES AND CONTROL PROCEDURES

Employees must perform their duties in the safest, most efficient manner possible and the service center has been equipped to facilitate these activities. Drums of product or waste will be moved using a handcart. Palletized wastes will be moved using a forklift or pallet jack. Upon arrival at the service center, containers of used solvent must immediately be added to the storage tank or placed in the drum storage areas. Open drums of solvent must not be left unattended. Below are descriptions of situations which can result in accidents and the precautions taken to prevent their occurrences.

E.4.1 Potential Minor Spill Sources

The following is a list of activities that have the potential for a minor (one that can be remediated without assistance from a clean up contractor) pollution incident:

a. Pouring of drummed solvent into the dumpster--Employee training emphasizes the importance of taking care in emptying the drums. However, as the contents of the drums are poured into the dumpster, solvent can splash out. The return and fill station is underlain by concrete containment with a sump. This design will contain this type of spill.

b. Filling of drums with solvent product--A low pressure hose with an automatic shut-off valve, similar to those used at automotive service stations, is used to fill the drums with solvent. Leaking fittings, a damaged hose or carelessness could lead to the discharge of solvent outside of the drum. Manual emergency shut-off valves are on each hose, should the equipment not function properly. In addition, employee training emphasizes the importance of inspection, maintenance and reporting of conditions with pollution incident potential.

c. Moving of containers--When a container is moved, a potential exists for it to tip over. To minimize the potential for spillage of solvent, all containers must be maintained in an upright position and remain tightly covered while in storage or in transit. The drum storage areas are designed so that if the contents of a container are spilled, the spilled material will be contained within the concrete trenches. If material is spilled, other containers are situated on pallets, therefore will not be in contact with the spilled material.

d. Delivery truck transfers--The cargo should be secured in the route vehicle with straps before transport. Individual containers of solvent can tip over or be dropped when being moved on or off a delivery truck so transfers will be made using a handcart and a hoist, if necessary.

If a spill does occur, the amount of solvent in the containers is normally a quantity which can be collected with sorbent clay or pads. Any contaminated soil that results from a spill will be removed manually, drummed, and shipped to a Safety-Kleen recycle center for proper disposal.

E.4.2 Potential Major Spill Source

The following activities have the potential for a major (one for which remedial action will require assistance) pollution incident:

a. Overfilling of storage tanks--Both product and used solvent tanks can be overfilled with a resulting discharge of solvent. A high level alarm and daily checks of tank volumes will prevent this type of incident.

b. Leaking pipelines--The pipelines to the storage tanks present a potential for leaks. Regular inspection of this equipment and the solvent inventory will detect any leaks.

E.4.3 Potential Fire Sources

The following is a list of fire prevention and minimization measures:

a. All wastes and products are kept away from ignitable sources-- Smoking is only permitted in designated areas, which are separate from any waste management areas. The solvent handling areas and the underground storage tanks are separated from the warehouse building area to minimize the potential for a fire to spread or injury to personnel to occur.

b. Ignitable wastes in containers are stored in the Flammable Materials Building, which is constructed with special explosion-proof wiring and is equipped with a fire suppression system.

c. Ignitable wastes are handled so that they do not:

1. Become subject to extreme heat or pressure, fire or explosion, or a violent reaction--The solvent waste is stored in a tank or in drums, none of which are near sources of extreme heat, fire, potential explosion sources or subject to violent reactions. The tanks are vented and the drums kept at room temperature to minimize the potential for pressure build up.

2. Produce uncontrolled toxic mists, fumes, dusts, or gases in quantities sufficient to threaten human health--The vapor pressure of solvent is low (2 mm) and it is reactive with strong oxidizers only. Toxic mists, fumes, dusts or gases will not form in quantities sufficient to threaten human health since strong oxidizers are not stored at this facility and the solvent vaporization will be minimal under normal working conditions.

3. Produce uncontrolled fires or gases in quantities sufficient to pose a risk of fire or explosion--See ‘a’ above and ‘c’ below.

4. Damage the structural integrity of the Safety-Kleen facility--The solvents will not cause deterioration of the tank, drums or other structural components of the facility.

d. Adequate aisle space is maintained to allow the unobstructed movement of personnel, fire protection equipment, and decontamination equipment to any area of the facility operation in an emergency.

e. "No Smoking" signs are posted in areas where solvents are handled or stored.

f. Fire extinguishers must be checked once per week and tested by the fire extinguisher company once per year. Fire extinguishers are placed at several locations throughout the facility.

E.5 TANK EVALUATION AND REPAIR PLAN

The product and waste solvent stored in the tanks at this facility are compatible with the carbon steel structure. If, during the inspections, corrosion is noted, or the leak detection system indicates a leak, the tank will be immediately taken out of service and repaired and/or replaced. In the case of a tank which leaks outside of the secondary containment, the facility's contingency plan will be initiated to insure the removal of any contaminated soil. Any extensive repairs to or replacement of the tank system will be assessed and certified by an independent engineer before the system is returned to use.

E.6 EXTERNAL FACTORS

The design of the facility is such that a harmful spill is highly unlikely to occur from most external factors. The storage tanks are accessible only to Safety-Kleen personnel and the main power switches are located inside. Also, the drum storage areas are in buildings which are accessible only to authorized personnel.

a. Vandalism – only extreme vandalism would result in a solvent spill or fire. Responses to spills and fires are described in the contingency plan.

b. Strikes – A strike would not result in a solvent spill or fire.

c. Power Failure – A power failure would not result in a spill or fire. Should a power failure occur, all activities requiring electricity will cease (i.e., pumps will shut off).

d. Flooding – The site elevation is above the projected 100-year flood plain; therefore, a 100-year flood will not affect the facility. A flood plain map is shown in Section 1.0.

e. Storms or Cold Weather - The solvent return and fill station and drum storage areas are roofed to eliminate the possibility of rain or snow entering the dumpsters. No precipitation event is anticipated that will affect the facility.

E.7 INTERNAL AND EXTERNAL COMMUNICATIONS AND ALARM SYSTEMS

Because the facility is small, internal communication within the building and the solvent return/fill area is accomplished by voice. An alarm is located at the return and fill station which alerts another employee in the warehouse that there may be a problem. Telephones will be used to report a spill or fire and to summon assistance from local and state emergency response agencies (if necessary). Emergency phone numbers of local and state emergency response teams are posted by each phone located in the sales office. Included in these phone numbers is the 24-hour telephone number which can be used to contact Safety-Kleen's environmental response coordinators. Releases to the environment will be reported within 24 hours, as required by permit condition Module I, Section E.13 and permit Attachment F, The Contingency Plan.

ATTACHMENT E-1

FACILITY DRAWINGS

ATTACHMENT E-2

UNDERGROUND TANK INSTALLATION ASSESSMENT REPORT

ATTACHMENT E-3

EXAMPLE CONTAINER SPECIFICATIONS

ATTACHMENT F

CONTINGENCY PLAN

CONTINGENCY PLAN

ABSTRACT

PURPOSE: This plan describes the proper action to be taken by employees during an emergency.

RESPONSIBILITIES: The emergency coordinator or his alternate is responsible for implementing the plan during an emergency.

EMERGENCY COORDINATOR: The Branch Manager is the emergency coordinator. The alternate emergency coordinator is a trained employee designated to this position by the emergency coordinator.

EMERGENCY NOTIFICATIONS:

Albuquerque Police Department	911 or (505) 242-2677
Albuquerque Fire Department	911 or (505) 243-6601
Presbyterian Hospital	911 or (505) 841-1111 or (505) 345-3655 (non-emergencies)
Safety-Kleen 24-Hour Emergency Response	(800) 468-1760
Rinchem (Emergency Response Contractor)	(505) 883-4242
New Mexico Environment Department	(505) 827-9329
National Response Center	(800) 424-8802

CONTINGENCY PLAN

Safety-Kleen Systems, Inc. (7-008-01)
2720 Girard NE
Albuquerque, New Mexico 87107

F.1 PURPOSE

The contingency plan describes the actions to be taken by each employee in the event of a spill, fire, explosion, or other emergency. It includes the information necessary to address emergency situations efficiently and in such a manner as to prevent or minimize hazards to human health or the environment due to fire, explosion, or any other release of hazardous materials to the air, soil, surface, water, or groundwater.

The contingency plan is to be carried out immediately whenever there is a release of hazardous material which could threaten human health or the environment. The contingency plan is kept at the facility. The Branch Manager ensures that the contingency plan is updated as necessary.

F.2 EMERGENCY COORDINATOR RESPONSIBILITIES

The emergency coordinator is responsible for implementing the contingency plan during an emergency; however, all employees must be familiar with the procedures in this plan and are responsible for proper implementation of the plan should the emergency coordinator or alternate be unavailable. The Branch Manger is the emergency coordinator and the alternate emergency coordinator is a trained employee designated to this position by the Branch Manager.

The emergency coordinator and alternate must be familiar with all aspects of this contingency plan, the operations and activities at the facility, the location and characteristics of materials handled, the location of all records within the facility and the facility layout. In addition, these coordinators have the authority to commit the resources necessary to carry out the contingency plan. Their home addresses and telephone numbers, as well as the office telephone number, are listed in Attachment F-1. Also listed in Attachment F are the assigned duties of each employee during an emergency. At least one employee will be at the facility or on call to respond to an emergency situation. In addition, facility personnel should be aware of the location of emergency equipment. An emergency equipment location plan is included in Attachment F-2, Figure F-1.

F.2.1 Responsibilities During an Emergency

Whenever there is an imminent or actual emergency situation that requires implementation of the contingency plan, the emergency coordinator (or alternate when the emergency coordinator is not available) must immediately:

a. activate the internal facility communication system to notify all facility personnel;

b. notify Safety-Kleen's Emergency Response Coordinator using the 24-hour telephone number - 800/468-1760; and

c. notify appropriate state or local agencies with designated response roles, as necessary.

Whenever there is a release, fire, or explosion, the emergency coordinator must immediately try to identify the character, exact source, amount, and extent of any contamination. Because of the limited number of materials being handled at the facility, he or she may do this by observation of by review of facility records. If necessary, outside laboratories may be contacted to perform chemical analysis.

Concurrently, the emergency coordinator must assess possible hazards to human health or the environment that may result from the result from the release, fire, or explosion. This assessment must consider both direct and indirect effects of the release, fire, or explosion (e.g., the effects of any toxic, irritating, or asphyxiating gases that may be generated, or the effects of any hazardous run-off).

During an emergency, the emergency coordinator must take all measures necessary to ensure that fires, explosions, and releases do not occur, recur, or spread to other hazardous waste at the facility. These measures must include, where applicable, stopping processes and operations, collecting and containing released waste, and removing or isolating containers.

F.2.2 Remedial Action Responsibilities

If the environment has been impacted or there is a potential for contamination as a result of a fire, explosion, or spill, the emergency coordinator must contact Safety-Kleen's Emergency Response Coordinator to report the incident. Fires, and explosions generally necessitate the implementation of this contingency plan. Any situation that has the potential for releasing solvent or solvent vapors or causing a fire or explosion should also be addressed in accordance with this plan. Should there be any questions as to whether this plan should be implemented (i.e., a problem is suspected but cannot be confirmed), Safety-Kleen's regional and/or corporate offices should be consulted for guidance.

The emergency coordinator must ensure that, in the potentially affected area(s) of the facility:

a. no substance that may be incompatible with the released material is brought on site until cleanup procedures are completed; and

b. all emergency equipment listed in the contingency plan is cleaned and fit for its intended use before operations are resumed.

F.2.3 Reporting Responsibilities

If the emergency coordinator determines that the facility has had a release that could threaten human health or the environment, the coordinator must report those findings as follows:

a. If the assessment indicates that evacuation of local areas may be advisable, the coordinator must immediately notify appropriate authorities.

b. The coordinator must immediately notify the Safety-Kleen Emergency Response Coordinator, and the New Mexico Environment Department (NMED) of any spill or release of hazardous waste in excess of the reportable quantity within 24 hours. The department will report to NMED the following:

1) name and telephone number of notifier;

2) name and address of facility;

3) time and type of incident (e.g., release, fire);

4) name and quantity of material(s) involved, to the extent known;

5) the extent of injuries, if any; and

6) the possible hazards to human health, or the environment outside the facility.

Safety-Kleen will notify the appropriate state and local authorities that the facility is in compliance with Section F.2.2 before operations are resumed in the affected area(s) of the facility.

The emergency coordinator must document the time, date, and details of any incident that requires the implementation of the contingency plan. Within 30 days of the incident, Safety-Kleen will submit a written report on the incident to the New Mexico Environment Department. The report will contain the information set out in 40 CFR, 264.196(d)(3) and must include:

a. name, address, and telephone number of the owner or operator;

b. name, address, and telephone number of the facility;

c. date, time, and type of incident (e.g., fire, explosion);

d. name and quantity of material(s) involved;

e. the extent of injuries, if any;

f. an assessment of actual or potential hazards to human health or the environment, where this is applicable; and

g. estimated quantity and disposition of recovered material that results from the incident.

F.2.4 Chain of Command

Based on the emergency response procedures described above, the chain of command during an emergency is as follows:

a. The person who discovers/causes the spill reports to the emergency coordinator.

b. The emergency coordinator contacts the Safety-Kleen Emergency Response Coordinator and NMED.

F.2.5 Government Agencies and Local Authorities to Be Notified

During an emergency, the following government agencies and local authorities may be contacted:

Agency or Authority	Rationale
Police Department	Notify if there is imminent danger to human health.
Fire Department	Notify if there is a fire, explosion, uncontrolled spill, or other imminent danger.
Hospital	Notify if there are any injuries.
NMED	Report releases, fires, and explosions.
Rinchem	Call to assist with remedial action after a release.

Arrangements have been made to familiarize the police department, fire department and local emergency response teams with the layout of the facility, the properties of hazardous materials handled and associated hazards, locations where facility personnel normally work, entrances to and roads inside the facility and possible evacuation routes. Arrangements have also been made to familiarize the local hospital with the types of injuries or illnesses which could result from fires, explosions, or releases at the facility.

F.3 EMERGENCY RESPONSE PROCEDURES

Response actions to be taken in specific emergency situations are described in the sections which to follow.

F.3.1 Minor Spills

If a spill should occur while pouring used solvent into a dumpster or filling drums with solvent product at the return and fill station, and it is contained in the secondary containment at the base of the return and fill station, remedial action will not be necessary. Should the spill

occur outside the containment, different actions must be taken depending on whether the spill occurs on a paved or unpaved area:

a. If the solvent spills on an unpaved area, the free solvent must be collected with sorbent sheets and/or sorbent clay (such as "Oil Dry"). The sorbents will be collected, drummed and shipped to a Safety-Kleen recycle center for proper disposal.

b. If the solvent spills on an unpaved area, the free solvent must be collected with sorbent material. The sorbent material and any contaminated soil must be collected, drummed and shipped to a Safety-Kleen recycle center or other permitted facility for proper disposal.

If a spill occurs while moving or delivering drums outside of the warehouse, the response actions described in 'a' and 'b' above must be followed. Spills inside the warehouse will be prevented from contaminating the environment by the concrete floor and the secondary containment. In the event of a spill indoors, the doors and windows should be opened to improve the ventilation in the confined area. If solvent is spilled in a non-explosion rated area or is flowing in such, insure that all sources of ignition (e.g., thermostats or light switches) are left in the same position (either on or off) as at the time of the spill. The worker will enter the area wearing appropriate personal protective equipment (PPE). The Material Safety Data Sheets (MSDSs) will be consulted to ensure appropriate PPE and spill procedures are utilized. Example MSDSs for typical S-K products are presented in Attachment F-3. Generally, spilled liquids are collected, placed in a container, and returned to storage.

Cleanups are completed only when the workers have cleaned themselves and the emergency equipment with soap and water. All minor spills must be reported to the Safety-Kleen Emergency Response Coordinator and the New Mexico Environment Department (if the spill is of a reportable quantity).

In the event a container is leaking, the contents will be transferred to a new container with a portable pump. A wet/dry vacuum is present at the site and may also be used in the event of a minor spill.

F.3.2 Major Spills

Any spill which can not be completely remediated using the methods described in 'a' and 'b' of Section 4.3.1 is a major spill. A major spill is usually the result of a vehicular accident, tank overfilling, equipment failure, or a fire. Spilled material which escapes collection can contaminate soil, surface water, groundwater, and/or sanitary sewer systems. Emergency response protocol for this type of spill should be as follows:

a. Assist any injured people, and call for medical assistance as necessary.

b. Stop the flow of material, if possible.

c. Retain, contain or slow the flow of the material if it can not be stopped.

d. If solvent escapes containment efforts, immediately call the local Fire Department, and report to the emergency coordinator and the Safety-Kleen Emergency Response Coordinator.

e. Immediately recover the spilled solvent to reduce property and environmental damage. Start recovery operations immediately.

The emergency coordinator shall report any incident as soon as possible to the Safety-Kleen Emergency Response Coordinator using the 24-hour telephone number: 800/468-1760. The emergency coordinator shall call an emergency cleanup response contractor, if it is deemed necessary, and report the incident to the National Response Center (telephone: 800/424-8802) and NMED (telephone: 505/827-9329 24-hour number).

The person reporting a spill should be prepared to give their name, position, company name, address, and telephone number. The person reporting should also describe the material spilled and, if possible, some estimate of the amount, the containment status and specify any equipment needed. Contaminated material resulting from remedial actions for major spills, will be disposed of at a properly permitted treatment or disposal facility.

Equipment used to respond to spills must be cleaned and decontaminated with a detergent/water solution. All incidents will be documented and kept on file as part of the operating record. They will be reviewed with branch personnel to prevent similar spills from occurring in the future.

All rinsates, waste residues, and decontamination fluids from the cleanup of spills or releases (whether major or minor), will be containerized and managed as hazardous waste unless analytical results verify the wastes are not hazardous. Wastes resulting from spill cleanups will be disposed in accordance with applicable regulations (i.e., HWMR-5, Part VIII).

F.3.3 Fire Control Procedures

If a small fire occurs, personnel must act quickly with an appropriately rated fire extinguisher to put out the fire before it spreads. If it can not be extinguished immediately the facility will be excavated and the fire and police departments will be contacted.

It is Safety-Kleen's policy that personnel only respond to incipient fires; that is, those which can immediately be extinguished using a fire extinguisher. Any fire which cannot be brought under control immediately or which has the potential to become uncontrollable, warrants implementation of the evacuation plan. Ignitable waste at the Albuquerque facility is stored in specially designed tanks, or in containers and placed in the Flammable Storage Building.

Safety-Kleen personnel and local authorities must be aware of appropriate response procedures, should a fire occur at the facility. This may include isolating the hazardous area and donning an appropriate positive pressure breathing apparatus.

F.4 EVACUATION PLAN

Exits are clearly marked in the warehouses and office areas. Employees are trained to be aware of all potential escape routes. The facility evacuation plan is included in Attachment F-2 (Figure F-2).

When an uncontrolled fire or release has occurred, all personnel are to be evacuated from the area and assemble across Girard Boulevard to assure that all personnel are accounted for and out of the hazardous area. The fire department must be notified at the time of evacuation either from a safe on-site building, from a neighboring facility or using a cellular phone.

F.5 ARRANGEMENT WITH EMERGENCY RESPONSE CONTRACTORS

An emergency response contractor is identified in the Contingency Plan Abstract (Page F-1) and on the Emergency Information Sheet (Attachment F-1). This contractor will provide emergency assistance during a release and/or cleanup.

F.6 POLLUTION INCIDENT HISTORY

There are no records of a pollution incident having occurred at this facility.

F.7 IMPLEMENTATION SCHEDULE

Where a hazard is imminent or an accident has already occurred, remedial action must be taken immediately. The branch manager has the overall responsibility for remediating any discrepancies found during a routine inspection, and will consult with the corporate environmental and engineering staffs to design an implementation schedule.

F.8 AVAILABILITY AND REVISION OF THE CONTINGENCY PLAN

This plan and all revisions to the plan are kept at the facility and regularly updated throughout the operating life of the facility. Copies of this document are provided to local authorities and organizations listed on the Emergency Information Sheet (Attachment F-1) and they may be called upon to provide emergency services. In addition, this plan and all revisions to the plan are made readily available to employees working at the facility.

The plan is reviewed and updated, if necessary, whenever:

a. the facility permittee is modified to allow new wastes to be stored or treated, or applicable regulations are revised;

b. the list or location of emergency equipment changes;

c. the facility changes in its design, construction, operation maintenance, or other circumstances in a way that:

(1) increases the potential for fires, explosions, or releases of hazardous constituents, or

(2) changes the response necessary in an emergency;

d. the names, addresses, or phone numbers of emergency coordinators change;

e. the employee assigned to each emergency task changes; or

f. the plan fails when implemented in an emergency.

ATTACHMENT F-1

EMERGENCY CONTACT INFORMATION

ATTACHMENT F-2

EMERGENCY EQUIPMENT LIST, LOCATION PLAN AND EVACUATION PLAN

EMERGENCY EQUIPMENT LIST

The following equipment shall be located in designated areas of the facility and the supply checked monthly:

Gloves - Gloves which are compatible with parts washer solvents are to be used when handling the solvents.

Safety Glasses or Face Mask - Whichever the worker prefers, is to be worn when loading or unloading the solvent.

Plastic Aprons - Are available for the situations where a solvent may get on the worker's clothing.

Shovels - In the event of a spill, shovels will be used to pick-up contaminated sorbent material.

Decontamination of all equipment is accomplished by washing with soap and water.

Eye Wash Stand--The eye wash stations are at several locations located at the Service Center, as shown on Figure F-1. The workers should try the stand and be familiar with its operation. The eye wash stand should be checked once a week for operation.

Showers--Should be checked periodically to ascertain that they are operational. Located in locker room area. Eye wash stands are equipped with a hand-held spray nozzle, which may also be used as a shower.

Ventilation--Any area that is closed and collects vapors should be avoided or equipped with proper fans to ensure adequate ventilation.

Fire Extinguisher--Each center should have a minimum of two 10-pound ABC extinguishers, located at the points where solvents are transferred. An ABC extinguisher is a universal system used on paper, wood and electrical, as well as solvent fires. The extinguishers must be full and carry an inspection tag.

Absorbent Material--An adequate supply (200 sheets, 2 bales and/or vermiculate) should be on hand to handle small spills. In the event of a spill, absorbents will be used to clean up spilled materials. Contaminated absorbent material will be placed in drums and managed as hazardous waste.

ATTACHMENT F-3

EXAMPLE MATERIAL SAFETY DATA SHEETS FOR TYPICAL SAFETY-KLEEN PRODUCTS

ATTACHMENT G

CLOSURE PLAN

CLOSURE PLAN

ABSTRACT

LOCATION ADDRESS: Safety-Kleen Corp. (7-008-01)
2720 Girard NE
Albuquerque, New Mexico 87107

U.S. EPA I.D. NO: NMD 000804294

WASTE UNITS TO UNDERGO CLOSURE:

a. Tank Storage - one 12, 000 gallon underground storage tank.

b. Drum Storage - an area of about 353 square feet with a storage capacity of 2,680 gallons (east) and an area of about 900 square feet with a storage capacity of 4,310 gallons (west).

c. Return and Fill Station - This waste management unit is used to transfer wastes to the used solvent storage tank. It has a containment capacity of approximately 350 gallons but typically operates at 30 gallons per dumpster/drum washer.

d. Flammable Storage Building - The location of this waste management unit is shown in the Site Plan. It has a storage capacity of 9,650 gallons of waste.

The volumes shown above are the maximum amounts that may be stored at this facility at any time.

CLOSURE PLAN

G.1 PURPOSE

The Albuquerque service center operates as a storage facility for hazardous wastes. The hazardous waste management units (HWMUs) must be closed in accordance with the closure requirements of New Mexico HWMR 206.C. Closure of the facility will be carried out in accordance with the steps outlined in this plan. Attachment H contains an estimated cost for the completion of closure. Safety-Kleen will remediate hazardous wastes and residues from the facility to a level protective of human health and the environment. Upon completion of closure activities, the need for further maintenance will be minimized or eliminated. The expected year of closure for this facility is 2020.

The HWMUs, which are subject to closure are described in the Closure Plan Abstract. The units include an underground storage tank system, a return and fill station with drum washers, two container storage areas and a flammable storage building. This closure plan identifies steps necessary to conduct facility closure, or closure of a unit (partial closure) at any point during its intended operation life. When implemented, the closure activities will be conducted under the supervision of a qualified independent engineer, registered in the State of New Mexico.

G.2 UNDERGROUND TANK AND ASSOCIATED PIPING

To safely clean and decommission the underground storage tank, the following activities will be performed, as appropriate:

a. Remove the remaining material from the tank and return the material to the Recycle Center for reclamation.

b. Provide access to the tank.

c. Rinse, scrape, and squeegee the tank interior as practical, removing all residual waste material and rinsate.

d. Disconnect and decontaminate all appurtenant piping and pumping equipment.

e. Excavate and remove tank. Dispose of any impacted soils offsite.

f. Visually inspect the tank for evidence of leakage.

g. Remove tank and appurtenant equipment and reuse or sell as scrap.

h. Backfill tank excavation with clean fill materials.

i. Transport and properly dispose or treat waste material generated during the closure.

G.2.1 Removal of Waste Material and Opening of the Tank

The contents of the tank are generally removed using a pump, vacuum or similar equipment and then shipped by tanker truck to a recycle center or contract reclaimer. To gain access to the underground tanks, use the manway. Depending on the type of opening and the condition of the equipment, a variety of tools may be used to open the manway. Care must be exercised to minimize spark generation when working on the tank.

Prior to entering the tank, personnel should have full face respiratory protection and protective clothing. Once the tanks have been opened, they must be provided with positive ventilation. The tanks will then be inspected to determine the approximate quantity and physical conditions of any remaining waste material.

G.2.2 Removal of Residual Waste and Cleaning of Tank

Before removing any residual waste from the tank, all piping and appurtenant equipment will be flushed with clean solvent followed by a detergent solution and triple rinsed.

The method used to remove the residual waste material from the tank will depend on the physical properties and quantities of that material. Prior to any person entering the tank, an effort will be made to remove as much liquid and sediment as possible (see Section G.2.1).

Subsequent to vacuuming the majority of the material from the tank, it may be necessary to use a high pressure wash system using clean solvent and a detergent solution and triple rinse to wash residual material from the walls, roof, and floor of the tank. The wash water will be managed as hazardous waste and shipped to a recycle center or contract reclaimer. The quantity of wash fluid used will be kept to a minimum in order to limit the amount of waste material.

Storage tanks are considered confined spaces (i.e., spaces open or closed having a limited means of egress in which poisonous gases or flammable vapors might accumulate or an oxygen deficiency might occur), and confined space entry requires special procedures. The contractor entering the confined space will be required to adhere to applicable regulations (29 CFR 1910.146).

G.2.3 Removal of the Tank

Following removal of residual wastes and decontamination activities, the tank system will be excavated and removed. To safely remove the tank:

a. Disconnect appurtenant piping.

b. Disconnect appurtenant pumping equipment.

c. The tanks and piping shall be removed, cut up and transported to a scrap metal facility for recycling. The tank and piping will be recycled in accordance with 40 CFR 261.1(c)(6) and (7). Verification of destruction will be provided by the contractor or scrap metal facility.

d. Two soil samples will be collected from the bottom of the tank excavation. Soil samples will be analyzed for waste constituents representative of the waste codes for the tank system (i.e., D004, D005, D006, D007, D008, D009, D010, D011, D018, D019, D021, D022, D023, D024, D025, D026, D027, D028, D029, D030, D032, D033, D034, D035, D036, D037, D038, D039, D040, D041, D042, and D043). If constituents are present above appropriate risk-based standards or screening levels, a workplan must be developed to determine the extent of contamination and proper remedial action.

e. Backfill the excavation with clean fill materials and grade to ground level.

G.3 DRUM STORAGE AREAS IN WAREHOUSE

The drum storage areas are used for the storage of drums of used immersion cleaner, dry cleaning waste, aqueous solvent, and other non-regulated wastes and/or products. At closure, the drums will be removed and transported to a reclaimer after proper packaging, labeling and manifesting. The contents of the drums will be reclaimed and the drums will be cleaned for reuse.

The concrete floors and spill containment trenches will be cleaned with a high pressure spray and detergent solution and triple rinsed. A sample of the final rinsate will be analyzed for volatile organic compounds to determine the effectiveness of the cleaning. If any volatile organic compounds are present above background levels or others appropriate levels, such as maximum contaminant levels (MCLs) for drinking water, the washing and rinsing will be repeated.

Following decontamination, the concrete floor, curbing, and containment trenches will be inspected by an independent registered Professional Engineer (or designate). If any lapses of integrity are found (i.e., through-going or unsealed cracks), soil samples must be collected from beneath the cracks and analyzed for volatile organic compounds. If constituents are present above appropriate risk-based standards or screening levels, a workplan must be developed to determine the extent of contamination and proper remedial action.

G.4 SOLVENT RETURN AND FILL STATION

The return and fill station is used to collect and return the used solvents to the waste storage tank. At closure, the sediment in the dumpsters/drum washer will be removed and drummed, labeled, manifested and then shipped to a Safety-Kleen recycle center or contract reclaimer.

The dumpster/drum washers and the dock area will be thoroughly washed with a detergent solution and high pressure spray, then triple rinsed. The rinsate may be discharged through the appurtenant piping system into the storage tank, which will be subjected to a separate closure procedure as described earlier. Alternately, the wash/rinse water may be collected in a vac truck or similar and placed in containers.

If components of the return/fill station will be re-used, (e.g., drum washers) a sample of the final rinsate will be collected from each of the units intended to be re-used. The rinsate sample will be analyzed for volatile organic compounds. If constituents are detected at levels above background (tap water) or other appropriate levels for comparison (e.g., MCLs for drinking water), the respective units will be re-cleaned. Should the components of the return/fill station be managed as scrap metal, rinsate samples will not be collected/analyzed. A certificate of destruction will be provided by the contractor or scrap metal facility.

Following decontamination and removal of the return/fill station, the underlying concrete slab will be inspected by the registered engineer (or designate) for potential lapses of integrity. If lapses of integrity are found during the inspection (i.e., through-going or unsealed cracks) that may have allowed potential migration of wastes outside the containment area, soil samples will be collected from immediately beneath the cracked areas and analyzed for constituents representative of the waste codes in Section G.2.3.d. If any constituents are detected at levels above appropriate risk-based standards or screening levels, a workplan will be prepared to determine the extent of impacts and possible remedial actions.

G.5 FLAMMABLE STORAGE BUILDING

The flammable storage building is used to temporarily store containers of paint waste, dumpster sediment, used solvent, other flammable materials and/or products. At closure, residual waste will be removed from the building and shipped to a Safety-Kleen recycle center or contract reclaimer. The concrete floor, curbing, and containment trenches will be thoroughly cleaned with a detergent solution and high pressure spray, then triple rinsed. The rinsate will be collected and managed as a hazardous waste. The final rinsate will be sampled, and the containment areas inspected/sampled as described in sections G.3 and G.4 above.

G.6 FACILITY CLOSURE SCHEDULE AND CERTIFICATION

Within 90 days of receiving the known last volume and hazardous wastes, Safety-Kleen will remove all hazardous wastes from the site in accordance with the approved closure plan. The New Mexico Health and Environment Deptartment may approve a longer period if Safety-Kleen demonstrates that the activities required to comply with this paragraph will, if necessity, take longer than 90 days to complete or the following requirements are met:

a. The facility has the capacity to receive additional wastes;

b. There is a likelihood that a person other than Safety-Kleen will recommence operation of the site; and/or

c. closure of the facility is incompatible with continued operation for the site. In this case, Safety-Kleen will take all steps necessary to prevent threats to human health and the environment.

Safety-Kleen will complete closure activities in accordance with the approved closure plan and within 180 days after receiving the final volume of wastes. When closure is completed, Safety-Kleen shall submit to the New Mexico Health and Environment Department certification, both by the operator and by an independent registered professional engineer, that the facility has been closed in accordance with the approved closure plan.

ATTACHMENT H

FINANCIAL LIABILITY DOCUMENTS

FINANCIAL ASSURANCE INFORMATION AND ESTIMATED CLOSURE COSTS

ATTACHMENT I

POLLUTION PREVENTION (WASTE MINIMIZATION) PLAN